

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**DAVITA M. KEY,**

**Plaintiff,**

**v.**

**HYUNDAI MOTOR MANUFACTURING  
ALABAMA, LLC, HYUNDAI  
ENGINEERING AMERICA, INC. and  
DYNAMIC SECURITY, INC.**

**Defendants.**

**CIVIL ACTION NUMBER:  
2:19-cv-00767-ECM-SMD**

**DEFENDANT HYUNDAI MOTOR MANUFACTURING  
ALABAMA, LLC'S EXHIBIT LIST**

COMES NOW, Defendant Hyundai Motor Manufacturing Alabama, LLC, and provides the following list of exhibits anticipated to be used in the trial of this matter<sup>1</sup>:

1. Deposition excerpts of Davita M. Key dated June 20, 2022, pursuant to Rule 32(a)(1) and (3) F.R.C.P. and Section 10 of the Court's Order (Doc. 57): 1:5-25, 4:1-5:25, 10:19-11:19, 243:7-9, 85:11-86:8, 115:1-9, 277:21-25, 19:10-24, 23:16-26:7, 40:18-41:8, 21:8-22:7, 18:15-24, 31:3-23, 36:1-38:5, 31:20-23, 32:25-33:17, 27:10-21, 28:1-4, 44:10-12, 17:21-18:1, 127:1-25, 128:19-129:16, 135:2-20, 115:18-116:14, 117:14-25, 116:15-117:5, 140:16-141:8, 141:25-143:4, 23:10-13, 35:24-25, 138:13-139:23, 141:9-12, 144:4-146:4, 51:6-13, 118:13-21, 147:20-148:6, 150:5-151:1, 119:8-120:2, 151:25-154:6, 120:13-122:3, 159:11-160:23, 63:24-65:1, 78:9-79:7, 67:8-10, 162:4-12, 164:17-23, 35:22-23, 165:8-20, 166:14-17, 167:8-13, 168:11-14, 168:15-24, 41:24-43:3, 174:11-22, 226:16-227:3, 125:13-126:6, 226:16-227:6, 29:8-18, 48:16-23, 52:11-53:22, 135:2-20, 21:24-22:7, 47:10-22, 58:16-18, 29:20-25, 47:10-22, 62:5-

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<sup>1</sup> All documents identified have been exchanged between the parties.

17, 75:1-76:2, 48:24-53:22, 56:16-57:3, 76:15-77:11, 62:2-17, 69:11-70:12, 70:13-19, 184:11-185:3, 270:21-271:3, 39:18-40:17, and any excerpt which may be needed for impeachment.

2. Exhibit 1 to Deposition of Davita M. Key dated June 20, 2022: First Amended Complaint dated June 1, 2020.

3. Exhibit 2 to Deposition of Davita M. Key dated June 20, 2022: Pre-Application Screening Form dated July 21, 2014 (Dynamic-Key000028; Key 000013).

4. Exhibit 3 to Deposition of Davita M. Key dated June 20, 2022: Paycheck and stub to Key from Dynamic Security, Inc. dated August 22, 2017 (Key 000001).

5. Exhibit 4 to Deposition of Davita M. Key dated June 20, 2022: Email to Key from Robinson re: Mailroom Position dated July 21, 2021 (Key 000254-000255).

6. Exhibit 5 to Deposition of Davita M. Key dated June 20, 2022: Plaintiff's Amended Initial Disclosures dated January 28, 2022.

7. Exhibit 6 to Deposition of Davita M. Key dated June 20, 2022: Diagram of the First Floor of the Administration Building (HMMA000077).

8. Exhibit 7 to Deposition of Davita M. Key dated June 20, 2022: Decision on Unemployment Compensation Claim dated September 27, 2017 (Key 000129-000130).

9. Exhibit 8 to Deposition of Davita M. Key dated June 20, 2022: HEA Appearance Standards for Security Personnel Policy (HEA 0001-003).

10. Exhibit 9 to Deposition of Davita M. Key dated June 20, 2022: HMMA's PPE & Dress Code Matrix dated July 22, 2013 (HMMA 0000003).

11. Exhibit 10 to Deposition of Davita M. Key dated June 20, 2022: Acknowledgment and Receipt of Employee Handbook dated July 21, 2017 (Dynamic-Key 000041-000042); Dynamic Security Officer's Handbook (Key 000332-000382).

12. Exhibit 11 to Deposition of Davita M. Key dated June 20, 2022: Hyundai Engineering America, Inc. Employee Handbook (HEA0004-0005).

13. Exhibit 12 to Deposition of Davita M. Key dated June 20, 2022: Hyundai Motor Manufacturing Alabama Safety, Security and Fire Protection Handbook (Key 000277 - 000331)

14. Exhibit 13 to Deposition of Davita M. Key dated June 20, 2022: U.S. Equal Employment Opportunity Commission Intake Questionnaire dated August 2, 2017 (Key 000049-000056).

15. Exhibit 14 to Deposition of Davita M. Key dated June 20, 2022: EEOC Charge of Discrimination to Dynamic Security Incorporated dated August 3, 2017, Charge No. 846-2017-32787 (Dynamic-Key 000046-000047).

16. Exhibit 15 to Deposition of Davita M. Key dated June 20, 2022: EEOC Charge of Discrimination to Hyundai Motor Manufacturing Alabama dated October 16, 2018, Charge No. 420-2019-00128 (Key 000047).

17. Exhibit 16 to Deposition of Davita M. Key dated June 20, 2022: Plaintiff's Response to Defendant HMMA's Interrogatories and Plaintiff's Response to Defendant HMMA's Request for Production of Documents dated December 6, 2021.

18. Exhibit 17 to Deposition of Davita M. Key dated June 20, 2022: Key Handwritten Statement dated August 8, 2017 (Dynamic-Key 000058-000063).

19. Exhibit 18 to Deposition of Davita M. Key dated June 20, 2022: Key Handwritten Complaint dated August 1, 2017.

20. Exhibit 19 to Deposition of Davita M. Key dated June 20, 2022: Acknowledgement of Receipt of Dynamic Security Inc.'s Security Officer's Manual dated July 21, 2017 (Dynamic-Key 000040).

21. Exhibit 20 to Deposition of Davita M. Key dated June 20, 2022: Dynamic Security, Inc. Harassment In the Workplace Policy signed by Key dated July 21, 2017 (Dynamic-Key 000042).

22. Exhibit 21 to Deposition of Davita M. Key dated June 20, 2022: Dynamic Security, Inc. Rules and Regulations for Security Officers Policy signed by Key dated July 21, 2017 (Dynamic-Key 000038-000039).

23. Exhibit 22 to Deposition of Davita M. Key dated June 20, 2022: U.S. Equal Employment Opportunity Commission Dismissal and Notice of Rights of Charge No. 846-2017-32787 dated March 1, 2019.

24. Exhibit 26 to Deposition of Davita M. Key dated June 20, 2022: Key Rebuttal to EEOC regarding Charge No. 846-2017-32787 (against Dynamic Security) dated October 4, 2017.

25. Exhibit 27 to Deposition of Davita M. Key dated June 20, 2022: Photos of Key (Key 000028-29).

26. Exhibit 28 to Deposition of Davita M. Key dated June 20, 2022: Key Letter to Board of Appeals, Alabama Department of Labor re: Case Number 07549-AT-17 dated October 4, 2017 (S000145-146).

27. Exhibit 29 to Deposition of Davita M. Key dated June 20, 2022: State Board of Appeals, Alabama Department of Labor, Disallowance of Application for Leave to Appeal to the Board of Appeals dated October 5, 2017 (S000151).

28. Exhibit 30 to Deposition of Davita M. Key dated June 20, 2022: Plaintiff's Response to Defendant HEA's First Discovery Requests dated March 27, 2022.

29. Exhibit 31 to Deposition of Davita M. Key dated June 20, 2022: Photos of Key (Key 000271-000276).

30. Exhibit 32 to Deposition of Davita M. Key dated June 20, 2022: Key Resume (Key 000034-000036).

31. Contract for Services between Hyundai Motor Manufacturing Alabama, LLC & Hyundai AMCO America Inc (HMMA000013-76).

32. Hyundai Motor Manufacturing Alabama, LLC Policies (HMMA000001-2).

33. Individual Employee Schedule for Courtney Dixon (Dynamic-Key 000969).

34. Declaration of Cassandra Williams dated May 8, 2019 (F00048).

35. HEA's Response to Plaintiff's Requests for Admission, RFA #2

36. Secretary of State Records for Hyundai ENG America, Inc.

37. Secretary of State Records for HEA.

38. Secretary of State Records for Hyundai Motor Manufacturing Alabama, LLC.

39. Secretary of State Records – Word Search “Hyundai”.

40. Plaintiff's Second Supplemental Responses to HMMA's Request for Production of Documents, #8.

41. Declaration of Gloria Robinson dated August 25, 2022.

42. Sworn Certification of Plaintiff's EEOC Charge file produced by the EEOC dated December 18, 2019.

43. Potential exhibits identified by Plaintiff in her Exhibit List, and the Exhibit Lists of Defendants Dynamic Security, Inc. and Hyundai Engineering America, Inc. that are not excluded by motion.

Respectfully Submitted,

s/ David J. Middlebrooks

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 26, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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s/ David J. Middlebrooks

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